

Mr. Heisig,

The allegations in this lawsuit are **absolutely false** and we will defend each one vigorously in court. That will play out soon enough in the courtroom, and we are confident the judge will agree.

The facts of this case are simple. After he decided to retire, the City of Independence worked closely with Mr. Mazzola and his union attorney to negotiate the terms of Mr. Mazzola's retirement. The City of Independence followed its policies and procedures in discussing its separation with Mr. Mazzola, including having Mr. Mazzola's union attorney present for those conversations and carefully adhering to our 30 page collectively bargained union contract. At no time was any allegation of the suppression of free speech brought up during these negotiations by Mr. Mazzola, his union representative, or his attorney (an attorney with over 40 years of legal experience) – because there was no suppression of free speech, period.

Only now, almost 7 months after Mr. Mazzola's retirement- a retirement in which he personally contacted the state pension authority notifying that office of his desire to retire- and with his new attorneys, Ms. Sletvold and Mr. Chandra's encouragement, Mr. Mazzola wants a do-over on a decision he made of his own free will and with the assistance and advice of his previous attorney signing off on all details. The City of Independence simply doesn't conduct public business that way.

Attorneys Sletvold and Chandra know this is a frivolous lawsuit based on information they know to be false. The fact that they have chosen to purposefully provide the court with a sham complaint disrespects the law and is a clear violation of Ohio Rules of Professional Conduct.

While I have professional respect for all who choose to practice in the legal profession, grandstanding for the media outside of the courtroom is often the first page of any attorney's playbook when their back is up against a wall, there are no truthful facts to support their complaint, and they know eventually they will lose in court. We will not try this case in the court of public opinion, as Ms. Sletvold and Mr. Chandra have chosen to do so.

Thank you.

Gregory J. O'Brien  
Law Director  
City of Independence